

210 Park Avenue, Suite 301 Florham Park, NJ 07932 Tel: 973.635.6300 | Fax: 973.635.6363 acllp.com

Andrew E. Anselmi, Esq.

Director

Direct Dial: 973.457.0116 Email: <a href="mailto:aanselmi@acllp.com">aanselmi@acllp.com</a>

August 26, 2022

## VIA ECF

Hon. Tonianne J. Bongiovanni, U.S.M.J. Clarkson S. Fisher Building and U.S. Courthouse 402 East State Street Trenton, New Jersey 08608

Re: AC&S Asbestos Settlement Trust, et al. v. Aldrich Pump LLC et al. Case No.: 3-22-cv-05116

Dear Judge Bongiovanni:

We represent interested party Verus Claims Services, LLC ("Verus") in this matter. On August 19, 2022, Verus filed its Motion to Quash Subpoena and to Stay (ECF Doc. No. 5). The motion is returnable before Your Honor on September 19, 2022.

As described in the letter of Lynda A. Bennett, Esq. (ECF Doc. No. 9) filed yesterday on behalf of the Trusts, the United States Court of Appeals for the Third Circuit has now issued its opinion in the matter of *In re Bestwall LLC*, No. 21-2263. A copy of the Court of Appeals' opinion was enclosed with Ms. Bennett's letter.

In light of the *Bestwall* decision, Verus hereby withdraws the portion of its motion requesting a stay of this matter pending disposition of that appeal. However, Verus maintains its request that this Court quash or modify the subpoena at issue. As with the Trusts, Verus will address the effect of *Bestwall* on the substance of Verus's motion to quash in its reply brief.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

Andrew F Angelmi

cc: all counsel of record (via ECF)